From: James Hightower
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:36:31 PM

OGE's proposed legal expense fund regulation, as drafted, stinks. We all know it. You know it.

I'm sure you've seen this copypasta before...

OGE should:
Remove the exception that makes compliance with the regulation optional; When Ethics regulations are optional, unethical people will ignore regulations.

Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;

Remove the offensive example involving an accused sexual harasser; That's just dumb.

And place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

You're seeing this because people are paying attention.

Thanks,

James Hightower
1628 Donaldson St
Los Angeles, CA 90026